

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

**COLE SCHOTZ P.C.**

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*Attorneys for Debtors  
and Debtors in Possession*

In re:

BLOCKFI INC., *et al.*,

Debtors.<sup>1</sup>

Case No.: 22-19361

Judge: Hon. Michael B. Kaplan

Chapter: 11

Hearing Date: July 20, 2023

**ADJOURNMENT REQUEST**

1. I, Michael D. Sirota, Esq.

☒ am the attorney for: the Debtors/Debtors-in-Possession,

☐ am self-represented,

and request an adjournment of the following hearing for the reason set forth below.

1. Notice of Debtors' Fourth Omnibus Objection to Certain Claims [Docket No. 1069];  
and

2. Response of George J. Gerro to Debtors' Fourth Omnibus Objection to Certain Claims (the "Response"); and Cross-Motion of George J. Gerro for an Order Temporarily Allowing Claim No. 12386 Pursuant to F.R.B.P. Rule 3018(a) for the

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors' service address is 201 Montgomery Street, Suite 263, Jersey City, NJ 07302.

Sole Purpose of Voting on a Chapter 11 Plan [Docket No. 1192] (the “Cross-Motion”).

**Current hearing date and time:** July 20, 2023 at 11:30 a.m.

**New date requested:** August 17, 2023 at 10:00 a.m.

**Reason for adjournment request:** After Mr. Gerro’s counsel filed the response and cross-motion she reached out to counsel for the Debtors to request a meet and confer. Counsel for the Debtors made a proposal that would, among other things, adjourn the hearings to September. Discussions between counsel for the parties occurred Friday and early Monday, and a call was held at the insistence of Mr. Gerro so he could make additional demands himself even though he is represented by counsel. The general terms and content of the stipulation were agreed upon and a draft was exchanged several times. Counsel for the Debtors incorporated several additions to the stipulation per Mr. Gerro’s request. As of 9:00 p.m. Monday, July 17, 2023 counsel for Mr. Gerro had signed off on the stipulation subject to Mr. Gerro himself also agreeing. Mr. Gerro sent counsel for the Debtors an email indicating he was doing a final review for “technicalities” and any additional changes would “reflect [the parties] mutual intentions.” He then sent a draft to counsel for the Debtors at 6:30am, on Tuesday, July 18, 2023, with an additional substantive request that the Debtors had stated from the beginning of negotiations was off the table. He indicated in his email that this was his best and final offer. Given the abrupt change in position by Mr. Gerro after his representation that he would agree to the general terms of the stipulation, the Debtors request that the hearing on the Fourth Omnibus Objection to Certain Claims and Cross-Motion be adjourned until August 17, 2023, with a deadline for the Debtors to reply to the Mr. Gerro’s Response and Cross-Motion of August 10, 2023.

2. Consent to adjournment:

☐ I have the consent of all parties. ☒ I do not have the consent of all parties (explain below):

The Debtors attempted to contact counsel for Mr. Gerro and was informed that counsel would be out of office for several days.

I certify under penalty of perjury that the foregoing is true.

Date: July 18, 2023

/s/ Michael D. Sirota  
Signature

**COURT USE ONLY:**

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The request for adjournment is:

8/17/2023 at 10:00 am

- ☒ Granted New hearing date:   x   ☐ Peremptory
- ☐ Granted over objection(s) New hearing date:        ☐ Peremptory
- ☐ Denied

**IMPORTANT: If your request is granted, you must notify interested parties who are not electronic filers of the new hearing date.**